

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

GABRIELA NIEVES,

Plaintiff,

v.

Case No: 1:20-cv-00320-JMS-DML

CARMEL CLAY SCHOOLS and RED
ROOF INN,

Defendants.

**DEFENDANT CARMEL CLAY SCHOOLS’
PRELIMINARY WITNESS AND EXHIBIT LISTS**

Defendant Carmel Clay Schools (“Defendant”), by counsel, pursuant to the Case Management Plan, submits its Preliminary Witness and Exhibit Lists:

I. WITNESSES

Defendant preliminarily identifies the following witnesses:

1. Gabriela Nieves
2. Plaintiff’s Parents, August and Darissa Nieves
3. John Goelz
4. John Goelz’s Girlfriend
5. Jon Ranochak
6. Chris Plumb
7. Jim Inskeep
8. Ron Hanh
9. Plaintiff’s Carmel High School Swim Teammates, including but not limited to Elizabeth Hanh

10. Representatives of Carmel Swim Club
11. John Pirics, Task Force Officer, Homeland Security Investigations
12. Special Agent Michael Johnson
13. The individual identified as “John Doe” in the Probable Cause Affidavit, who discovered the relationship between Plaintiff and John Goelz
14. Representatives of the FBI and United States Attorney’s Office involved in the criminal investigation of John Goelz
15. Plaintiff’s medical providers, including but not limited to: (1) Kelly Ferriell; (2) Kacey Oiness; (3) Dr. James Malenkos; and (4) Plaintiff’s gynecological providers, if any.
16. Representatives of Red Roof Inn
17. All witnesses and parties deposed in the course of this litigation
18. Any witness identified by Plaintiff
19. Any witness identified in discovery
20. Rebuttal witnesses
21. Witnesses necessary for authentication of documents or evidence

Defendant reserves the right to supplement this list of witnesses as information about Plaintiff’s claims and/or Defendant’s defenses becomes known throughout the course of investigation and discovery.

II. EXHIBITS

Defendant preliminarily identifies the following exhibits:

- A. Carmel High School Coaching Materials, including written handbooks and policies distributed to Carmel Swim Coaches

- B. December 12, 2017 Email Communications Concerning Report from Ron Hanh
- C. Background check and certifications for John Goelz
- D. Letter to swim families regarding John Goelz's arrest
- E. Statements, Documents, and Related Materials that became part of the criminal investigation and prosecution of John Goelz
- F. Defendant's communications with Plaintiff
- G. Defendant's communications with John Goelz
- H. Plaintiff's communications with John Goelz
- I. Plaintiff's medical records, including those provided by including but not limited to the following providers: (1) Kelly Ferriell; (2) Kacey Oiness; (3) Dr. James Malenkos; and (4) Plaintiff's gynecological providers, if any
- J. Any Document produced in discovery by any party, including non-parties
- K. Any Document listed by Plaintiff on any exhibit list filed in this action

Defendant reserves the right to supplement this list of documents as information about Plaintiff's claims and/or Defendant's defenses becomes known throughout the course of investigation and discovery.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of June, 2020, a true and exact copy of the foregoing was sent electronically to the following counsel of record:

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